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and Matthew DiOrio*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	Case No. 19-34054-sgj-11
Debtor.	
UBS SECURITIES LLC AND UBS AG LONDON BRANCH,	Adversary Proceeding
Plaintiffs,	No. 21-03020-sgj
vs.	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	
Defendant.	

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

FORMER EMPLOYEES' RESPONSE TO UBS MOTION TO COMPEL

Mary Kathryn Lucas (née Irving), John Paul Sevilla, Scott Ellington, Isaac Leventon, and Matthew DiOrio (collectively, the “**Former Employees**”) file this response in opposition to UBS’s motion to compel (Adv. Dkt. No. 74) (the “**Motion to Compel**”). For the reasons stated in the Former Employees’ brief in support of this response and reply in support of their motion to quash subpoenas (Adv. Dkt. No. 70) (the “**Motion to Quash**”), which is being filed substantially contemporaneously with this response in accordance with Local Bankruptcy Rule 7007-1(d), the Former Employees respectfully request that the Court deny the Motion to Compel in its entirety and grant the Motion to Quash.

Respectfully submitted June 10, 2021

By: /s/ Frances A. Smith
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